

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

FILED

APR 12 2022

PATRICK KEANEY
Clerk, U.S. District Court

By _____
Deputy Clerk

UNITED STATES OF AMERICA,

Plaintiff,

v.

VICTOR JULIO HOTEMA,

Defendant.

SEALED

Case No.

CR 22-057-RAW

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

**POSSESSION OF CERTAIN MATERIAL INVOLVING THE SEXUAL
EXPLOITATION OF A MINOR
[18 U.S.C. § 2252(a)(4)(B) & (b)(2)]**

From on or about August 1, 2019, through on or about March 2, 2022, in the Eastern District of Oklahoma, the defendant, **VICTOR JULIO HOTEMA**, did knowingly possess and access with the intent to view, one or more matters which contained visual depictions the production of which involved the use of a minor engaging in sexually explicit conduct, as that term is defined in Title 18, United States Code, Section 2256(2), including visual depictions of prepubescent minors, and said visual depictions are of such sexually explicit conduct and had been transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and which was produced using materials which have been so shipped and so transported, by any means including by computer, in violation of Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2).

FORFEITURE ALLEGATION
[18 U.S.C. § 2253]

1. The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 2253.

2. Upon conviction of the violation alleged in Count One of this Indictment involving violations of Title 18, United States Code, Section 2252, the defendant, **VICTOR JULIO HOTEMA**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, any and all of the defendant's right, title and interest in:

a. any visual depiction described in section 2251, 2251A, or 2252, 2252A, 2252B, or 2260 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received;

b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and

c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

3. The property subject to forfeiture, pursuant to Title 18, United States Code, Section 2253, includes, but is not limited to iPhone 11 Model Number: MHCX3LL/A, S/N DX3DRF7HN72Q.

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

A TRUE BILL:

CHRISTOPHER J. WILSON
United States Attorney



HANNAH JONES, IN. BA # 32026-49
Assistant United States Attorney

Pursuant to the E-Government Act,
the original indictment has been filed
under seal in the Clerk's Office.

s / Foreperson
FOREPERSON OF THE GRAND JURY